



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

PATRICIA MILLER
Division Chief
(212) 356-3500 (tel.)

May 9, 2022

By ECF

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am the Division Chief of the Special Federal Litigation Division in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. In an order, dated May 2, 2022, the Court directed the undersigned:

“[T]o consult separately with each employee of the Law Department who has worked on the consolidated cases to determine whether any such employee is aware of any other misrepresentations that have been made either to the Court or to opposing counsel in connection with the consolidated cases.”

“Employee” is interpreted to mean current and former employees including attorneys and support staff who had any participation in the Consolidated Cases.

“Consult” is interpreted as a one-on-one interview with the undersigned and an employee. Also present during an interview is the Law Department’s Chief Ethics Officer.

At this time, 46 employees have been identified as having at least some participation in the Consolidated Protest cases. At this point, 43% have been consulted resulting in nothing further to report to the Court.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Patricia Miller', with a stylized, flowing script.

Patricia Miller
Division Chief
Special Federal Litigation Division

c: ALL COUNSEL (via ECF only)